

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

TEXAS LEAGUE OF UNITED LATIN
AMERICAN CITIZENS,

and

NATIONAL LEAGUE OF UNITED LATIN
AMERICAN CITIZENS,

and

JULIE HILBERG, individually and on behalf of
others similarly situated,

Plaintiffs,

v.

DAVID WHITLEY, in his official capacity as
Secretary of State for the State of Texas,

and

KEN PAXTON, in his official capacity as
Attorney General for the State of Texas,

Defendants.

Civil Action

Case No. 5:19-cv-00074-FB

**PLAINTIFFS' ADVISORY
REGARDING FEBRUARY 19
HEARING**

Pursuant to this Court's February 11, 2019 order, Plaintiffs submit this report "setting forth which lawyers will be advocating on particular issues, a list of potential witnesses, and which counsel will be involved in direct and cross-examination." Doc. 17.

We anticipate the following attorneys will be presenting oral argument on the legal issues at issue for this hearing on Plaintiffs' Motion for Preliminary Injunction and Defendants' Motion to Dismiss:

- Opening Remarks: Luis Roberto Vera Jr.
- Plaintiffs' Motion for Preliminary Injunction: Danielle Lang
- Defendants' Motion to Dismiss: Mark Gaber

Plaintiffs contemplate presenting the following potential witnesses with the following advocates conducting direct examination:

- George Korbel, Elections Expert (Advocate: Chad Dunn)
- Plaintiff Julie Hilberg (Advocate: Danielle Lang)
- Gayatri Vasan, Department of Public Safety (Advocate: Danielle Lang)
- Betsy Schonhoff, former employee of the Elections Division (Advocate: Chad Dunn)
- Christina Adkins, Elections Division (Advocate: Mark Gaber)
- Lupe Torres, State Director of Texas LULAC (Advocate: Luis Roberto Vera, Jr.)
- Janet Neek, Family & Literacy Inc., Kerrville, Texas (Advocate: Danielle Lang)

Depending on availability and need, Plaintiffs may call some of the following Texas election officials:

- Jacquelyn Callanen, Bexar County Elections Administrator (Advocate: Luis Roberto Vera, Jr.)
- Jose Salvador Tellez, Webb County Elections Administrator (Advocate: Luis Roberto Vera, Jr.)
- Kristen Spies, Blanco County Tax Assessor Collector (Advocate: Mark Gaber)
- Lisa Adam, Guadalupe County Elections Administrator (Advocate: Mark Gaber)
- Gwenda L. Tschirhart, Bandera County Tax Assessor Collector (Advocate: Mark Gaber)
- Cheryl Johnson, Galveston County Tax Assessor Collector (Advocate: Chad Dunn)
- Bob Reeves, Kerr County Tax Assessor Collector (Advocate: Chad Dunn)

Plaintiffs contemplate that the following advocates will participate in cross-examination: Chad Dunn and Mark Gaber.

February 14, 2019

Respectfully submitted

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on February 14, 2019 the foregoing was served on all counsel of record via the Court's CM-ECF system.

/s/ Luis R. Vera, Jr.
Luis Roberto Vera, Jr.

Counsel for Plaintiffs